

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20054

RECEIVED

AUG 25 2000

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of:)
)
Request for Review of the Decision of the)
Universal Service Administrator by)
)
School District of Philadelphia)
Philadelphia, PA)
)
Federal-State Joint Board on Universal Service)
)
Changes to the Board of Directors of the)
National Exchange Carrier Association, Inc.)

File No. SLD-446637

CC Docket No. 96-45

CC Docket No. 97-21

To: The Commission
Chief, Common Carrier Bureau

APPLICATION FOR REVIEW

Pursuant to Subpart I of Part 54 of the Commission's rules, the School District of Philadelphia ("Philadelphia"), by its attorneys, hereby seeks review of the determination of the Schools and Library Division of the Universal Service Administrative Company ("SLD"), dated July 28, 2000, denying Philadelphia's funding request No. 446637. In support thereof, the following is shown:

I. **Summary and Statement of the Facts**

Philadelphia seeks review of the SLD's determination, made July 28, 2000 in the attached Funding Commitment Report (Attachment A), denying funding for internal connections (pre-discount amount requested \$512,000.00) because 30% or more of the requested FRN included "a request for Sun Microsystems DHCP servers which are ineligible products based on program rules." In attempting to ascertain the basis for this finding, Philadelphia was further informed by SLD staff that funding was denied on the basis of internal SLD staff eligibility guidelines classifying a DHCP

server as an ineligible product. Philadelphia has repeatedly requested, but has not to date been provided with a copy of the relevant internal guideline (which was only vaguely described to a Philadelphia's representative in a phone conversation) or any further explanation of the reasons or basis for the classification. Further, Philadelphia was advised that while this classification information is not in the SLD's published Eligibility List, Philadelphia would have been informed of the SLD's ineligible classification, had it checked with the SLD staff prior to filing its FCC Form 471 Request For Funding.

The pertinent excerpts from Philadelphia's FCC Form 471 Funding Request and Response to the SLD's request for further information are attached as Attachment B. Therein, certain servers (denoted Dynamic IP Server, 21st Street - Primary and JFK-Primary) with a total pre-discount cost quote of \$104,242.80 (approximately 19.7% of the total quote) were identified by Philadelphia as DHCP (centralized dynamic address distribution) servers.¹ They were requested to provide Internet Protocol (IP) addressing capability to individual Internet access units within classrooms. This functionality is an essential component to the transport of information to the classroom, well within the definition of eligible internal connections set forth in Section 54.506 of the Commission's rules. Indeed, without the capability to assign IP addresses to individual classroom access units, the ability to transport information to classrooms would be completely frustrated.

Philadelphia suspects the internal SLD classification may flow from a misperception that a DHCP server is not necessary to the transport of information to classrooms. However, as no further

1. Specifically, the term "DHCP Server" was used by Philadelphia to refer to a server (in this case, a Sun Microsystems Enterprise, Model 420R and associated equipment) which would be configured to provide only dynamic IP functionality in an overall network environment. This is often done in network environments in lieu of assigning a permanent IP address to each individual computer in the network. It is a widely accepted system design which conserves IP addresses, increases network security and is more cost efficient than individual IP addresses. For ease of reference, however, the term "DHCP Server" will be used in this pleading to refer to the servers requested by Philadelphia to provide dynamic IP functionality. The pre-discount amount specified in the FRN (\$512,000) is slightly less than the total initial quote (\$529,586.65) due to a minor adjustment in the final contract price not relevant to this appeal.

information has been provided by SLD, Philadelphia has no basis to know this, in fact, is the case. Nor does Philadelphia have any basis to know whether the SLD's conclusion that DHCP servers constituted more than 30% of the FRN is a simple mathematical mistake ² or whether other components of the FRN were also deemed to be DHCP servers.

II. DHCP Servers Are Eligible for Funding Under Basic FCC Rules and All Published SLD Eligibility Standards

Section 54.506 of the Commission's rules provides "...a service is eligible for support as a component of an institution's internal connections if such service is necessary to transport information within one or more instructional buildings of a single school campus..." As summarized by the Commission in its *Report and Order* authorizing funding for internal connections, "if the service is an essential element in the transmission of information within the school or library, we will classify, it as an element of internal connections..."³ Simply put, in order to send and receive information from classroom computers to the Internet, DHCP functionality is essential. Thus, DHCP servers are eligible internal connections.

Every computer needs an IP address to send and receive information over the Internet. DNS servers, for example, provide desktop computers in the classroom with IP addresses of other computers on the Internet. This enables classroom computers to access other Internet sites. Without a DNS server, classroom computers would not have the ability to access the Internet. As DNS servers provide functionality essential to transport information to individual classrooms, SLD published guidelines (SLD Eligible Services List, attached as Attachment C, December 2, 1999, p. 25, Domain Name Servers unconditionally eligible), expressly classify a DNS Server as an eligible internal connection.

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2. Even apportioning a pro rata share of requested overall installation costs (\$90,000) to the dynamic IP servers, the cost of those servers would not exceed 30% of the total FRN.
 3. In re Federal-State Joint Board on Universal Service, *Report and Order*, CC Docket No. 96-45, 12 FCC Rcd. 8776, 9021 (1997).

DHCP servers function similarly, but in reverse. Instead of giving out the IP addresses of other computers, DHCP servers temporarily assign IP addresses to classroom computers, thus permitting the classroom computer to receive information coming from other sources over the Internet. This functionality, like DNS functionality, is “an essential element in the transmission of information within the school.” Thus, it squarely falls within the FCC’s definition of internal connections. Without an IP address assignment, a classroom computer would not be able to communicate with any other computer on the Internet. Both DNS *and* DHCP functionality are required for Internet access. If a DNS server is eligible for E-rate support, logic dictates that a DHCP server must be eligible as well.

The types of file servers listed on the SLD Eligibility List as either eligible or ineligible demonstrates plainly that the FCC and SLD have considered a wide range of file server functionality and, after careful review, deemed most of them to be eligible. The only type of file servers that appear not to be eligible are those that either store content (CD server) or are to be used to facilitate remote access to the network from ineligible locations (remote access servers). The list demonstrates that a file server need not be a direct conduit for information in the completely literal sense, like a switch or a router, in order to satisfy the definition of an “internal connection.” Rather, it is evident from the list and certainly makes sense from a technological perspective that a file server is an “internal connection,” if it plays an integral role or, as the FCC states, is “an essential element” in the transmission of information to the classroom.

A web server is an excellent example of the application of this “essential element” test to determine whether a server that performs a specialized network function is an “internal connection.” A web server is a host for web content; it neither switches nor routes information, per se. A web server, however, is an essential element in the transmission of the web content hosted on that server (e.g., a school’s web pages) to classroom computers. Thus, even though it does not transmit information in the same way as, for example, a router does, this type of server has been included on the published SLD Eligibility List.

A DHCP server is even more “essential” to the transmission of information on a school network than a web server. Without a web server, students in classrooms still will have access to the Internet. The only thing that they will not be able to access is the information on that particular web server. In contrast, eliminating DHCP server functionality means that classroom computers will not have the ability to obtain IP addresses. Without those addresses, students in classrooms will not be able to access any web server information anywhere on the Internet.

As the FCC has ruled that a web server is an eligible file server, then a DHCP server can be no less eligible. Finding otherwise would be plainly at odds with all previous FCC and SLD rulings on the eligibility of file servers. Moreover, it would send applicants the wrong message that, in an already complex program, no logical basis exists for determining, in advance, whether the sophisticated network hardware needed for overall system operation is either eligible or ineligible for E-rate support.

As provided in Section 54.506, even if not located within a school building or campus, equipment will be deemed an eligible internal connection where it is “essential for the effective transport of information to an instructional building of a school...” In this case, the DHCP servers sought by Philadelphia fall squarely into the scope of this provision. While located on the premises of a Philadelphia administrative building, they function solely to provide Internet access and to facilitate to the transport of information to classrooms, -- specifically, providing critical IP address functionality to classroom computers. ⁴

4. Nor do the DHCP servers constitute wide area network equipment ineligible for funding. In this respect, the description of services set forth in Philadelphia’s Form 471 Application describes the servers as “allowing access to IP addressing across the wide-area network. The reference to wide-area network is not a wide-area network within the meaning of Section 54.500(1) of the Commission’s Rules, but rather was intended as a collective reference to each school’s local area network.

In this respect, one aspect of the Commission's recent Tennessee decision is particularly instructive.⁵ Therein, the Commission found that certain so called hub site equipment located on school premises were not internal connections because each school's local area network operated independently of the hub site and could continue to operate unimpeded if disconnected from the hub site. Therefore, the hub sites were not "...necessary to transport information *within* the schools' instructional buildings on a single campus, and are thus, not internal connections." Tennessee, ¶ 38. Precisely the opposite is the situation in this case. As shown above, in the absence of the functionality provided by DHCP servers, individual computers within each Philadelphia school simply will not be able to operate to access the Internet.

In establishing the Schools and Libraries Program, the Commission accorded schools broad discretion to "make their own decisions regarding which technologies would best accommodate their needs, [and] how to deploy those technologies..."⁶ In this case, the SLD has improperly intruded on this discretion. While it would have been substantially more expensive, Philadelphia theoretically could have configured the internal connection network within each Philadelphia school to include a stand-alone IP address functionality. No question of funding eligibility would have been raised. Yet, because Philadelphia opted to employ a more technically efficient and economically less expensive approach to provide IP address functionality to all Philadelphia schools from centralized DHCP servers, funding was denied by the SLD. This is a result which makes no sense whatsoever.

III. SLD May Not Deny Funding Based on Internal Unpublished Eligibility Standards Inconsistent With Its Published Eligibility Standards

Even assuming for purposes of argument that the ineligible classification of a DHCP server was an appropriate exercise of the SLD's discretion to apply basic FCC funding eligibility rules, it was wrong for the SLD to act on the basis of a non-public internal standard without prior public

5. Request for review by the Department of Education of the State of Tennessee, FCC 99-216, released August 11, 1999, ¶ 37.

6. *Report and Order*, CC Docket No. 96-45 12 FCC Rcd. at 9019.

notice of the classification. As shown above, based both on governing FCC Rules and the SLD's published Eligibility List, it was eminently reasonable for Philadelphia to conclude that a DHCP server was an eligible internal connection. While not identified by a specific name on the SLD's public Eligibility List, both its functionality and the description of other specific types of eligible servers on the current SLD Eligibility List⁷ reasonably lead to a conclusion that a DHCP server is eligible. As previously shown, the DHCP Server is quite unlike the two types of servers listed as ineligible (Remote Access Server, p. 24, and CD ROM Server, p. 25), but rather functions like a Domain Name Server (DNS) specifically designated as eligible (p. 25) on the SLD's published Eligibility List. It is by these publically announced Eligibility List standards that Philadelphia's application should have been evaluated and granted.

Where the ground rules have not been made public so as to permit applicants to make informed judgments in filing applications, the law is clear that funding should not be denied based on an unknown standard.⁸ In the Williamsburg-James City case, for example, the Commission determined that it was error for the SLD to deny a funding request because of the applicant's failure to segregate Priority 1 Telecommunications Services from Priority 2 Internal Connections when, at the time the application was filed, the Commission's rules of priority had not been adopted and released. This case presents an even more egregious situation for the SLD acted solely on the basis of a non-public, internal eligibility guideline, quite different from its published Eligibility List standards on which Philadelphia reasonably relied. As the Court of Appeals has cautioned with respect to another agency's reliance on non-public standards to determine what constitutes an impermissible substance, "a complicated regulatory regime . . . cannot function effectively unless citizens are given fair notice of their obligations." Massachusetts v. Blackstone Valley Electric Co., 67 F.3d 981,991 (1st Cir. 1995).

7. Eligible Services List, December 6, 1999, pp 24, 25, 31. Copies of these pages from the SLD website are attached (Attachment C) for ease of reference.

8. See e.g., Request for Review of Decision by Williamsburg-James City Public Schools, 14 FCC 2nd Rcd. 20152 (1999); and Request for Review by Bonner Springs Unified School District #204, DA00-1044, released May 17, 2000.

Nor does the SLD's "you should have asked and we would have told you" approach cure the situation. As the Commission has ruled on numerous occasions, informal SLD staff advice is no substitute for publicly announced rules and standards, such as the Eligibility List on the SLD website. In situations where the informal SLD staff advice has been incorrect, the Commission has held that published rules and policies must nonetheless be enforced to deny the applicant's request for funding despite its good-faith reliance on the incorrect staff guidance.⁹ Certainly, the same principle applies when the SLD is essentially contending that an internal guideline only vaguely described over the telephone should override its own published Eligibility List on the SLD website. To hold otherwise would be completely contrary to the Commission's holding in the recent Ubly case expressly cautioning applicants to use and rely upon the SLD published Eligibility List. Request for Review of Decision by Ubly Community Schools, DA00-1517, released July 10, 2000, ¶ 6. Furthermore, such an illogical holding would place applicants in a true "Catch 22" situation, precluded from relying on informal staff advice in some cases, but required in other cases to seek and rely on exactly the same type of staff advice.

Finally, the result is made even more arbitrary by the SLD's failure to explain its decision and application of the "30% or more rule" to deny the entire Philadelphia funding request. Under the Administrative Procedure Act (APA), an applicant is entitled to a reasoned explanation of the grounds for the denial of its application. 5 U.S.C. § 555(e). In violation of this fundamental requirement of fair administrative procedure¹⁰, no explanation has been provided by SLD of either the basis and reasons for SLD internal guideline classification or how it was applied in this instance

9. See e.g., Request for Review of Decision by Ruidoso Municipal School District, DA00-105, released January 21, 2000.

10. As the Commission has held that USAC is an agent of the government for purposes of the disbursement of funds (Changes to the Board of Directors of the National Exchange Carrier Association, Inc., FCC 99-291, released October 8, 1999), presumably the SLD's disbursing activities are subject to the requirements of the APA. See 5 U.S.C. § 551(i). Even if not expressly subject to APA requirements, certainly its procedures for activities governed by FCC rules should be subject to basic APA procedural requirements in the interests of fairness to all parties and sound administrative practices.

to the several categories of equipment requested in the overall FRN. All Philadelphia knows (assuming no mathematical mistake) is that certain unidentified items exceeding 30% of the total FRN were perceived by the SLD to constitute DHCP servers deemed ineligible by SLD for reasons that have not been disclosed. As neither published standards nor the FRN determination explain the action and the “rationale for the ... denial is hardly self-evident ...,” the action cannot stand. City of Gillette, Wyo. v. F.E.R.C., 737 F.2d 883, 887 (10th Cir. 1984).

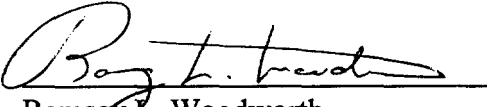
As Philadelphia had no basis to know the SLD deemed DHCP servers to be ineligible, let alone what SLD deemed to be a DHCP server, application of the 30% or more rule is particularly unreasonable in this case. In good faith, Philadelphia prepared and filed its funding request on the reasonable expectancy (based on FCC Rules and published SLD website information) that all internal connections included in FRN 446637 were eligible for funding. It had no basis even to suspect that it might be intermixing eligible and ineligible equipment in one funding request. Yet, in effect, Philadelphia is being punished for intermixing ineligible and eligible equipment in one request through the denial of funding for undisputably eligible equipment. Neither the purpose for 30% rule (to discourage applicants from improper intermixing) nor any other reasonable policy objective is served by the ensuing result. Consistent with Commission precedent requiring that applicants be on notice as to the need to segregate FRN requests (Williamsburg-James City, supra), the Commission at the minimum is required to remand this matter to the SLD for processing and grant of the undisputed portion of the FRN.

CONCLUSION

For these reasons, Philadelphia requests that the funding decision of the SLD in FRN446637 be reversed and remanded to the SLD for processing consistent with FCC rules and published SLD eligibility standards under which DHCP servers are clearly eligible for funding. Because of the lack of notice of any need to posture its funding request differently, Philadelphia further requests that the SLD be instructed to process the funding request without regard to its "30% or more" processing standard.

Respectfully submitted,

SHOOK, HARDY & BACON, LLP

By: 
Ramsey L. Woodworth
Counsel for the School District of Philadelphia

Shook, Hardy & Bacon, LLP
660 14th Street, NW, Suite 800
Washington, DC 20006-2004
(202) 783-8400

August 24, 2000

ATTACHMENT A
(Funding Commitment Report)

FUNDING COMMITMENT REPORT

Form 471 Application Number: 200041

✓ Funding Request Number: 446529 Funding Status: Funded
SPIN: 143005214 Service Provider Name: Lucent Technologies, Inc.
Contract Number: 382/F00
Services Ordered: Internal Connections
Earliest Possible Effective Date of Discount: 07/01/2000
Contract Expiration Date: 06/30/2001
Billing Account Number: 0023-852-2411
Pre-Discount Amount: \$300,000.00
Discount Percentage Approved by the SLD: 85%
Funding Commitment Decision: \$255,000.00 - 471 approved as submitted

✓ Funding Request Number: 446534 Funding Status: Funded
SPIN: 143005214 Service Provider Name: Lucent Technologies, Inc.
Contract Number: PCL00/L1 (PEPPM)
Services Ordered: Internal Connections
Earliest Possible Effective Date of Discount: 07/01/2000
Contract Expiration Date: 06/30/2001
Billing Account Number: 0023-039-1617
Pre-Discount Amount: \$232,000.00
Discount Percentage Approved by the SLD: 90%
Funding Commitment Decision: \$208,800.00 - 471 approved as submitted

X Funding Request Number: 446536 Funding Status: Not Funded
SPIN: 143005214 Service Provider Name: Lucent Technologies, Inc.
Contract Number: PCL00/L1 (PEPPM)
Services Ordered: Internal Connections
Earliest Possible Effective Date of Discount: 07/01/2000
Contract Expiration Date: 06/30/2001
Billing Account Number: 0023-039-1617
Pre-Discount Amount: \$168,000.00
Discount Percentage Approved by the SLD: N/A
Funding Commitment Decision: \$0.00 - Srvc/Discont will not be funded
Funding Commitment Decision Explanation: Funding cap will not provide for Internal
Connections less than 81% discount to be funded. Please see
WWW.SL.UNIVERSALSERVICE.ORG What's New Area for further details.

X Funding Request Number: 446537 Funding Status: Not Funded
SPIN: 143007989 Service Provider Name: Perfect Order, Inc.
Contract Number: PCL00/P1 (PEPPM)
Services Ordered: Internal Connections
Earliest Possible Effective Date of Discount: 07/01/2000
Contract Expiration Date: 06/30/2001
Billing Account Number: PSD
Pre-Discount Amount: \$512,000.00
Discount Percentage Approved by the SLD: N/A
Funding Commitment Decision: \$0.00 - Incl. svcs./ or product(s)
Funding Commitment Decision Explanation: 30% or more of this FRN includes a request
for Sun Microsystems DHCP servers which are ineligible products based on program
rules.

ATTACHMENT B

**(FCC Form 471 Funding Request and Response to the
SLD's Request for Further Information)**

Entity Number <u>0000126161</u>	Applicant's Form Identifier <u>SDP-PY3-471-02</u>
Contact Person <u>Robert Westall</u>	Phone Number <u>(215) 875-2323</u>

Block 5: Discount Funding Request(s)

Block 5, page 24 of 25

Instructions: Use one Block 5 page for **EACH** service (Funding Request Number) for which you are requesting discounts.
 Make as many copies of this page as necessary, and number the completed pages to assure that they are all processed correctly.

11 Category of Service (only ONE category should be checked) <input type="radio"/> Telecommunications Service <input type="radio"/> Internet Access <input checked="" type="radio"/> Internal Connections	15 Contract Number (if available; use "T" if tariffed services, "MTM" if month-to-month services as described in Instructions) PCL00/P1 (PEPPM) 16 Billing Account Number (e.g., billed telephone number) PSD									
12 Form 470 Application Number (15 digits) 734470000245091	17 Allowable Contract Date (mm/dd/yyyy, based on Form 470 filing) 10/14/1999									
13 SPIN - Service Provider Identification Number (9 digits) 143007989	18 Contract Award Date (mm/dd/yyyy) 01/10/2000 19 Service Start Date (mm/dd/yyyy) 07/01/2000									
14 Service Provider Name Perfect Order, Inc.	20 Contract Expiration Date (mm/dd/yyyy) 06/30/2001									
21 Description of This Service: You MUST attach a description of the service, including a breakdown of components and costs, plus any relevant brand names. Label this description with an Attachment #, and note number in space provided below. Attachment # <u>B-24</u>										
22 Entity/Entities Receiving This Service: a. If the service is site-specific (provided to one site and not shared by others), list the Entity Number of the entity from Block 4 receiving this service : _____ b. If the service is shared by all entities on a Block 4 worksheet, list the worksheet number (e.g., A-1): <u>A-1</u>										
23 Calculations										
Recurring Charges					One-Time Charges			Total Charges		
A	B	C	D	E	F	G	H	I	J	K
Monthly \$ charges (total amount per month for service)	How much of the \$ amount in (A) is ineligible?	Eligible monthly pre-discount amount (A minus B)	# of months service provided in program year	Annual pre-discount \$ amount for eligible recurring charges (D x C)	Annual non-recurring (one-time) \$ charges	How much of the \$ amount in (F) is ineligible?	Annual eligible pre-discount \$ amount for one-time charges (F minus G)	Total program year pre-discount \$ amount (E + H)	% discount (from Block 4 Worksheet)	Funding Commitment \$ Request (J x I)
					\$ 512,000.00		\$ 512,000.00	\$ 512,000.00	85%	\$ 435,200.00

Entity Number: 0000126161
Contact Person: Robert Westall

Applicant's Form Identifier SDP-PY3-471-02
Phone Number (215) 875-2323

Description of Service Attachment

Attachment Number **B-24**

Vendor / SPIN	Contract #	Description of Services
Perfect Order, Inc. 143007989	PCL00/P1 (PEPPM)	Purchase and installation of four Sun Microsystems enterprise servers to provide HTTP (web), POP/IMAP (mail), and NNTP (news) services to schools. Purchase and installation of four Sun Microsystems DHCP (centralized dynamic address distribution) servers for allowing access to IP addressing across the wide-area network.

Philadelphia School District
PY3 PIA Information Request Response

Vendor: Perfect Order, Inc.

FRN: 446637

Discount Rate: 85%

Per Unit Price: Varies - see attached

Quantity: Varies - see attached

Total Price: \$512,000.00

Description: Purchase and installation of four Sun Microsystems enterprise servers to provide HTTP (web), POP/IMAP (mail), and NNTP (news) services to schools. Purchase and installation of four Sun Microsystems DHCP (centralized dynamic address distribution) servers for allowing access to IP addressing across the wide-area network.



Perfect Order Manufacturing Sales Quotation

1150 Lancaster Blvd. Suite 100 Mechanicsburg PA 17055
Phone: +1 800 851 1281 Fax: +1 717 796 9759

Date	Quote Number	FOB	Quote Valid For
11/22/99	1999-MCH-8995	Origin	30 days

Credit Terms	Salesperson	Method
Net 30	Chris Feret	NA

Quote Prepared For	Local Office Address
--------------------	----------------------

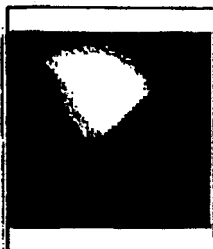
Robert Westall School District of Philadelphia 734 Schuykill Ave Rm 610 Philadelphia PA 19146-2397	Refer to Main Office Address
---	------------------------------

Ph/Fax: (215) 875-2323/(215) 875-3855	Ph/Fax: 1 800 851 1281/1 717 796 9759
---------------------------------------	---------------------------------------

Qty	Part No.	Description	List Pr.	Disc.	Net Pr.	Ext Net Pr.
2	A34-AA	Enterprise 220R Server Base Configuration, one power supply, 32x CD ROM, Solaris server license	3565.00	17%	2958.95	5917.90
4	1195A	UltraSPARC-II 450MHz processor module with 4MB cache for Sun Enterprise 420R Server and Sun Enterprise 220R Server	6500.00	17%	5395.00	21580.00
16	7004A	Sun Ultra Systems Memory 256-Mbyte Memory Expansion (2 x 128-Mbyte DIMMs)	1350.00	17%	1120.50	17928.00
4	5237A	Internal 18.2-Gbyte, 10000 RPM UltraSCSI disk drive, 1" high	1500.00	17%	1245.00	4980.00
2	9684A	Redundant power supply for E420R AND E220R	695.00	17%	576.85	1153.70
4	X311L	Localized Power Cord Kit North American-Asian	0.00	0%	0.00	0.00
Grand Total:						51559.60

Notes
User Notes: Enterprise 220R - Internal DNS pair - 2 CPU / 2 G / 2 18G Disks
Acceptance of Customer's order is expressly made conditional on Customer's assent to the Terms and Conditions set forth Below:
The Company makes no warranty, express or implied (including but not limited to warranties of merchantability and fitness for intended purposes) statutory or related to Year 2000 issues, Other than the foregoing express warranty.
Quotes being accepted for purchase must be accompanied by a hardcopy purchase order. Orders will not be processed without a purchase order. This quote will remain valid for the period stated above unless requested by Perfect Order. Perfect Order will not be bound by any terms of a Customer Order which are not consistent with the terms set forth by this quote.
Purchases in excess of ten thousand dollars will be subject to Assignment of Proceeds.

INTERNAL DNS (JFK-PRIMARY/SECONDARY)



Perfect Order Manufacturing Sales Quotation

1150 Lancaster Blvd. Suite 100 Mechanicsburg PA 17055
Phone: +1 800 851 1281 Fax: +1 717 796 9759

Date	Quote Number	FOB	Quote Valid For
11/22/99	1999-MCH-8996	Origin	30 days

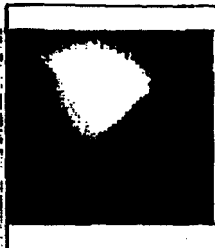
Credit Terms	Salesperson	Method
Net 30	Chris Feret	NA

Quote Prepared For	Local Office Address
Robert Westall School District of Philadelphia 734 Schuykill Ave Rm 610 Philadelphia PA 19146-2397 Ph/Fax: (215) 875-2323/(215) 875-3855	Refer to Main Office Address Ph/Fax: 1 800 851 1281/1 717 796 9759

Qty	Part No.	Description	List Pr.	Disc.	Net Pr.	Ext Net Pr.
2	A34-AA	Enterprise 220R Server Base Configuration, one power supply, 32x CD ROM, Solaris server license	3565.00	17%	2958.95	5917.90
4	1195A	UltraSPARC-II 450MHz processor module with 4MB cache for Sun Enterprise 420R Server and Sun Enterprise 220R Server	6500.00	17%	5395.00	21580.00
16	7004A	Sun Ultra Systems Memory 256-Mbyte Memory Expansion (2 x 128-Mbyte DIMMs)	1350.00	17%	1120.50	17928.00
4	5237A	Internal 18.2-Gbyte, 10000 RPM UltraSCSI disk drive, 1" high	1500.00	17%	1245.00	4980.00
2	9684A	Redundant power supply for E420R AND E220R	695.00	17%	576.85	1153.70
4	X311L	Localized Power Cord Kit North American-Asian	0.00	0%	0.00	0.00
Grand Total:						51559.60

Notes
User Notes: Enterprise 220R - External DNS pair - 2 CPU / 2 G / 2 18G Disks
Acceptance of Customer's order is expressly made conditional on Customer's assent to the Terms and Conditions set forth Below:
The Company makes no warranty, express or implied (including but not limited to warranties of merchantability and fitness for intended purposes) statutory or related to Year 2000 issues. Other than the foregoing express warranty.
Quotes being accepted for purchase must be accompanied by a hardcopy purchase order. Orders will not be processed without a purchase order. This quote will remain valid for the period stated above unless requested by Perfect Order. Perfect Order will not be bound by any terms of a Customer Order which are not consistent with the terms set forth by this quote.
Purchases in excess of ten thousand dollars will be subject to Assignment of Proceeds.

EXTERNAL DNS (JFK-PRIMARY/SECONDARY)



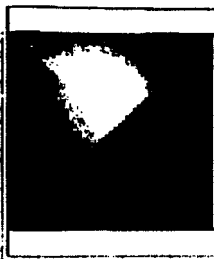
Perfect Order Manufacturing Sales Quotation

1150 Lancaster Blvd. Suite 100 Mechanicsburg PA 17055
Phone: +1 800 851 1281 Fax: +1 717 796 9759

Date	Quote Number	FOB	Quote Valid For			
12/15/99	1999-MCH-9493	Origin	30 days			
Credit Terms	Salesperson	Method				
Net 30	Chris Feret	NA				
Quote Prepared For		Local Office Address				
Robert Westall School District of Philadelphia 734 Schuykill Ave Rm 610 Philadelphia PA 19146-2397		Refer to Main Office Address				
Ph/Fax: (215) 875-2323/(215) 875-3855		Ph/Fax: 1 800 851 1281/1 717 796 9759				
Qty	Part No.	Description	List Pr.	Disc.	Net Pr.	Ext Net Pr.
1	A33-AA	Enterprise 420R Server Base Configuration, one power supply, 32x CD ROM, Solaris server license	7335.00	17%	6088.05	6088.05
4	1195A	UltraSPARC-II 450MHz processor module with 4MB cache for Sun Enterprise 420R Server and Sun Enterprise 220R Server	6500.00	17%	5395.00	21580.00
8	7005A	512-Mbyte Memory Expansion (2 x 256-Mbyte DIMMs) for Enterprise 450 Only	3000.00	17%	2490.00	19920.00
2	5237A	Internal 18.2-Gbyte, 10000 RPM UltraSCSI disk drive, 1" high	1500.00	17%	1245.00	2490.00
1	9684A	Redundant power supply for E420R AND E220R	695.00	17%	576.85	576.85
2	X311L	Localized Power Cord Kit North American-Asian	0.00	0%	0.00	0.00
1	1141A	Sun GigabitEthernet PCI Adapter 2.0	2095.00	30%	1466.50	1466.50
Grand Total:						52121.40

Notes
User Notes: Vector Server
Acceptance of Customer's order is expressly made conditional on Customer's assent to the Terms and Conditions set forth Below:
The Company makes no warranty, express or implied (including but not limited to warranties of merchantability and fitness for intended purposes) statutory or related to Year 2000 issues. Other than the foregoing express warranty.
Quotes being accepted for purchase must be accompanied by a hardcopy purchase order. Orders will not be processed without a purchase order. This quote will remain valid for the period stated above unless requested by Perfect Order. Perfect Order will not be bound by any terms of a Customer Order which are not consistent with the terms set forth by this quote.
Purchases in excess of ten thousand dollars will be subject to Assignment of Proceeds.

DYNAMIC IP SERVER (21ST STREET-PRIMARY)



Perfect Order Manufacturing Sales Quotation

1150 Lancaster Blvd. Suite 100 Mechanicsburg PA 17055
Phone: +1 800 851 1281 Fax: +1 717 796 9759

Date	Quote Number	FOB	Quote Valid For
12/15/99	1999-MCH-9502	Origin	30 days

Credit Terms	Salesperson	Method
Net 30	Chris Feret	NA

Quote Prepared For	Local Office Address
Robert Westall School District of Philadelphia 734 Schuykill Ave Rm 610 Philadelphia PA 19146-2397	Refer to Main Office Address

Ph/Fax: (215) 875-2323/(215) 875-3855	Ph/Fax: 1 800 851 1281/1 717 796 9759
---------------------------------------	---------------------------------------

Qty	Part No.	Description	List Pr.	Disc.	Net Pr.	Ext Net Pr.
1	A33-AA	Enterprise 420R Server Base Configuration, one power supply, 32x CD ROM, Solaris server license	7335.00	17%	6088.05	6088.05
4	1195A	UltraSPARC-II 450MHz processor module with 4MB cache for Sun Enterprise 420R Server and Sun Enterprise 220R Server	6500.00	17%	5395.00	21580.00
8	7005A	512-Mbyte Memory Expansion (2 x 256-Mbyte DIMMs) for Enterprise 450 Only	3000.00	17%	2490.00	19920.00
2	5237A	Internal 18.2-Gbyte, 10000 RPM UltraSCSI disk drive, 1" high	1500.00	17%	1245.00	2490.00
1	9684A	Redundant power supply for E420R AND E220R	695.00	17%	576.85	576.85
2	X311L	Localized Power Cord Kit North American-Asian	0.00	0%	0.00	0.00
1	1141A	Sun GigabitEthernet PCI Adapter 2.0	2095.00	30%	1466.50	1466.50
Grand Total:						52121.40

Notes

User Notes:

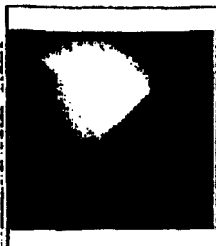
Acceptance of Customer's order is expressly made conditional on Customer's assent to the Terms and Conditions set forth Below:

The Company makes no warranty, express or implied (including but not limited to warranties of merchantability and fitness for intended purposes) statutory or related to Year 2000 issues, Other than the foregoing express warranty.

Quotes being accepted for purchase must be accompanied by a hardcopy purchase order. Orders will not be processed without a purchase order. This quote will remain valid for the period stated above unless requested by Perfect Order. Perfect Order will not be bound by any terms of a Customer Order which are not consistent with the terms set forth by this quote.

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DYNAMIC IP SERVER (JFK-PRIMARY)



Perfect Order Manufacturing Sales Quotation

1150 Lancaster Blvd. Suite 100 Mechanicsburg PA 17055

Phone: +1 800 851 1281 Fax: +1 717 796 9759

Date	Quote Number	FOB	Quote Valid For
12/15/99	1999-MCH-9492	Origin	30 days

Credit Terms	Salesperson	Method
Net 30	Chris Feret	NA

Quote Prepared For	Local Office Address
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Robert Westall
School District of Philadelphia
734 Schuykill Ave Rm 610
Philadelphia PA 19146-2397

Refer to Main Office Address

Ph/Fax: (215) 875-2323/(215) 875-3855

Ph/Fax: 1 800 851 1281/1 717 796 9759

Qty	Part No.	Description	List Pr.	Disc.	Net Pr.	Ext Net Pr.
2	A33-AA	Enterprise 420R Server Base Configuration, one power supply, 32x CD ROM, Solaris server license	7335.00	17%	6088.05	12176.10
8	1195A	UltraSPARC-II 450MHz processor module with 4MB cache for Sun Enterprise 420R Server and Sun Enterprise 220R Server	6500.00	17%	5395.00	43160.00
16	7005A	512-Mbyte Memory Expansion (2 x 256-Mbyte DIMMs) for Enterprise 450 Only	3000.00	17%	2490.00	39840.00
4	5237A	Internal 18.2-Gbyte, 10000 RPM UltraSCSI disk drive, 1" high	1500.00	17%	1245.00	4980.00
2	1034A	Quad FastEthernet PCI Card (QFE) Quad FastEthernet is a high performance, high density network interface card. QFE provides immediate increase in bandwidth to the user in the PCI interface format. Factory installed option	1795.00	30%	1256.50	2513.00
2	9684A	Redundant power supply for E420R AND E220R	695.00	17%	576.85	1153.70
4	X311L	Localized Power Cord Kit North American-Asian	0.00	0%	0.00	0.00
2	1141A	Sun GigabitEthernet PCI Adapter 2.0	2095.00	30%	1466.50	2933.00
Grand Total:						106755.80

Notes

User Notes:

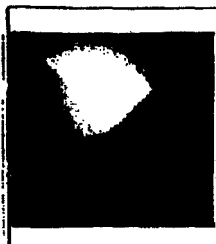
Acceptance of Customer's order is expressly made conditional on Customer's assent to the Terms and Conditions set forth Below:

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ADDRESS TRANSLATION SERVER (JFK-INTERNET)



Perfect Order Manufacturing Sales Quotation

1150 Lancaster Blvd. Suite 100 Mechanicsburg PA 17055

Phone: +1 800 851 1281 Fax: +1 717 796 9759

Date	Quote Number	FOB	Quote Valid For			
12/15/99	1999-MCH-9499	Origin	30 days			
Credit Terms	Salesperson	Method				
Net 30	Chris Feret	NA				
Quote Prepared For		Local Office Address				
Robert Westall School District of Philadelphia 734 Schuykill Ave Rm 610 Philadelphia PA 19146-2397		Refer to Main Office Address				
Ph/Fax: (215) 875-2323/(215) 875-3855		Ph/Fax: 1 800 851 1281/1 717 796 9759				
Qty	Part No.	Description	List Pr.	Disc.	Net Pr.	Ext Net Pr.
20	X5234A	Internal 9.1-Gbyte, 10000 RPM 1" high, UltraSCSI disk drive	1100.00	17%	913.00	18260.00
1	X9818A	Front door assembly for 72" expansion cabinet	650.00	30%	455.00	455.00
Grand Total:						18715.00

Notes
User Notes: Mail server upgrades - 20 9-Gigabytes disks and disk array door assy.
Acceptance of Customer's order is expressly made conditional on Customer's assent to the Terms and Conditions set forth Below:
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Quotes being accepted for purchase must be accompanied by a hardcopy purchase order. Orders will not be processed without a purchase order. This quote will remain valid for the period stated above unless requested by Perfect Order. Perfect Order will not be bound by any terms of a Customer Order which are not consistent with the terms set forth by this quote.
Purchases in excess of ten thousand dollars will be subject to Assignment of Proceeds.

E-MAIL UPGRADE



Perfect Order Manufacturing Sales Quotation

1150 Lancaster Blvd. Suite 100 Mechanicsburg PA 17055

Phone: +1 800 851 1281 Fax: +1 717 796 9759

Date	Quote Number	FOB	Quote Valid For
12/17/99	1999-MCH-9550	Origin	30 days

Credit Terms	Salesperson	Method
Net 30	Chris Feret	NA

Quote Prepared For	Local Office Address
Robert Westall School District of Philadelphia 734 Schuylkill Ave. JFK Center - RM610 Philadelphia PA 19146	Refer to Main Office Address
Ph/Fax: (215)875-2323/(215)875-3855	Ph/Fax: 1 800 851 1281/1 717 796 9759

Qty	Part No.	Description	List Pr.	Disc.	Net Pr.	Ext Net Pr.
1	SDP ICT90	Install/Config/Test/Integrate new environment.	90000.00	0%	90000.00	90000.00
Grand Total:						90000.00

Notes
User Notes:
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Quotes being accepted for purchase must be accompanied by a hardcopy purchase order. Orders will not be processed without a purchase order. This quote will remain valid for the period stated above unless requested by Perfect Order. Perfect Order will not be bound by any terms of a Customer Order which are not consistent with the terms set forth by this quote.
Purchases in excess of ten thousand dollars will be subject to Assignment of Proceeds.

INSTALLATION & CONFIGURATION



Perfect Order Manufacturing Sales Quotation

1150 Lancaster Blvd. Suite 100 Mechanicsburg PA 17055
Phone: +1 800 851 1281 Fax: +1 717 796 9759

Date	Quote Number	FOB	Quote Valid For
11/12/99	1999-MCH-8762	Origin	30 days

Credit Terms	Salesperson	Method
Net 30	Chris Feret	NA

Quote Prepared For	Local Office Address
Robert Westall School District of Philadelphia 734 Schuylkill Ave Rm 610 Philadelphia PA 19146-2397 Ph/Fax: (215) 875-2323/(215) 875-3855	Refer to Main Office Address Ph/Fax: 1 800 851 1281/1 717 796 9759

Qty	Part No.	Description	List Pr.	Disc.	Net Pr.	Ext Net Pr.
1	UPS_50KVASeries300	Liebert 50kVA / 40 kW Liebert Series 300 Three Phase UPS Model UDC63050C25RT03	63500.00	30%	44450.00	44450.00
1	UPS_Ser_50KVA_ext	Extended warranty including 4hr emergency response 7x24	4560.00	10%	4104.00	4104.00
1	UPS_Batt_50KVA_ext	Signature U: includes 3 quartly and 1 yearly PM servive vists - for battery string. 4 hour response. 7x24	10260.00	10%	9234.00	9234.00
Grand Total:						57788.00

Notes
User Notes: 50 kVA Liebert UPS
Acceptance of Customer's order is expressly made conditional on Customer's assent to the Terms and Conditions set forth Below:
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UPS SYSTEM



Perfect Order Manufacturing Sales Quotation

1150 Lancaster Blvd. Suite 100 Mechanicsburg PA 17055
Phone: +1 800 851 1281 Fax: +1 717 796 9759

Date	Quote Number	FOB	Quote Valid For
12/14/99	1999-MCH-9456	Origin	30 days

Credit Terms	Salesperson	Method
Net 30	Chris Feret	NA

Quote Prepared For	Local Office Address
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Robert Westall School District of Philadelphia 734 Schuykill Ave Rm 610 Philadelphia PA 19146-2397	Refer to Main Office Address
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Ph/Fax: (215) 875-2323/(215) 875-3855	Ph/Fax: 1 800 851 1281/1 717 796 9759
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Qty	Part No.	Description	List Pr.	Disc.	Net Pr.	Ext Net Pr.
1	UGMB-A25AA-A25BA	Upgrade from any E450 250MHz or 300MHz Motherboard to 400MHz enabled E450 Motherboard.	3400.00	17%	2822.00	2822.00
2	UG-M22XX-M2244	Upgrade from any E450 300MHz UltraSPARC-2 module to a 400MHz UltraSPARC-2 module with 4-Mbyte E-cache & DC-DC conv FIELD INSTALLED This CPU requires a 400MHz ready E450 motherboard. E450 purchased prior to 1-1-99 may require a new board #501-5270. Order board UGMB-A25AA-A25BA.	3900.00	17%	3237.00	6474.00
2	X2244A	400MHz UltraSPARC2 CPU w-4MB E-cache & dc-dc converter for Ultra Enterprise 450 Server	5600.00	17%	4648.00	9296.00
6	7005A	512-Mbyte Memory Expansion (2 x 256-Mbyte DIMMs) for Enterprise 450 Only	3000.00	17%	2490.00	14940.00
2	6601A	Factory installed 8 bay internal storage expansion kit for Enterprise 450 Server; includes 8 slot disk backplane, PCI UltraSCSI controller, and cables	1135.00	17%	942.05	1884.10
10	5234A	Internal 9.1-Gbyte, 10000 RPM 1" high, UltraSCSI disk drive	1100.00	17%	913.00	9130.00
2	X1141A	PCI Gigabit Ethernet Network Interface Card which provides Sun customers with the next generation Gigabit Ethernet product. The adapter has a single multimode fiber interface which supports 1000Base-T. It is a half size PCI form factor for 5 and 3.3 volt options.	2095.00	17%	1738.85	3477.70

1	X9682A	560W power supply for Ultra Enterprise 450 Server	1135.00	17%	942.05	942.05
Grand Total:						48965.85

Notes						
User Notes: Ultra 450 upgrade						
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NETWORK-OS SERVER UPGRADE

ATTACHMENT C

(Schools and Libraries Eligibility List - copies of pages from the SLD website)

SCHOOLS AND LIBRARIES^{2, 3}**Eligibility List**

SERVICE	ELEMENT/ DESCRIPTION	ELIGIBLE YES/NO	PARAGRAPH CITE
TELECOMMUNICATIONS SERVICES			
<p>The primary purpose of the services for which support is sought must be the delivery of services to the classrooms or other places of instruction at schools and libraries that meet the statutory definition of an eligible institution. Support for the administrative functions of library or education programs is permitted so long as the services are part of the network of shared services for learning. Support will be limited to services delivered to the onsite educational facility or facilities.⁴</p> <p>The Paragraph Cite column represents the paragraph from FCC 97-157, FCC 97-420, Appendix or the FCC Public Notice "Updated Frequently Asked Questions on Universal Service and the Snowe-Rockefeller-Exon-Kerrey Amendment" that is most closely associated with the particular service. The information in the column is not intended to be all inclusive and other references should be considered.</p> <p>To be eligible for support, Telecommunications Services must be provided by an eligible Telecommunications Service provider, that is, one who provides Telecommunications Service on a common carriage basis. A provider/carrier is providing services on a common carriage basis if it holds itself out to provide service generally to the public for a fee. A State commission may upon its own motion or upon request designate a common carrier that meets the requirements as set forth in the Communications Act of 1934, Section 214 {47 U.S.C. 241} (e) (2) Designation of Eligible Telecommunications Carriers.</p>			

Items in **Bold** indicate an addition or modification of a product or service.

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¹ Federal-State Joint Board on Universal Service, CC Docket No. 96-45, Report and Order, 12 FCC Rcd 8776 (1997).
ERRATA released 6/04/97 and 12/24/97.

² Eligible schools and libraries should receive discounts of between 20 and 90 percent on all Telecommunications services, Internet access and internal connections provided by Telecommunications carriers.

³ Eligible schools and libraries will be permitted to apply their relevant discounts to information services provided by entities that consist of:

- (i) the transmission of information as a common carrier;
- (ii) the transmission of information as part of a gateway to an information service, where that transmission does not involve the generation or alteration of the content of information but may include data transmission, address translation, protocol conversion, billing management, introductory information content, and navigational systems that enable users to access information services that do not affect the presentation of such information services to users; and
- (iii) electronic mail services [e-mail].

⁴ Formal position statement adopted by the Schools and Libraries Corporation Board of Directors on November 20, 1997.

Public Address P.A. System	A system that allows the user to make announcements through the use of amplifiers and speakers. Typically, access is provided through a telephone system either manually or automatically by dialing a preassigned number.	No	459 460
Raceway	Raceway, which is a metal or plastic channel used for holding electrical or telephone wire is conditionally eligible for discounts. Raceway located inside an eligible entity's building (school or library) as well as raceway between eligible buildings located on a single campus (not crossing a public right of way) is eligible for discounts. Raceway used for electrical wiring or for Wide Area Network is not eligible for discount.	Conditional	459 460
Rack Mounted Power Strips	Rack mounted power strips are incidental to equipment racks installed to house eligible equipment. Equipment racks are an eligible component of Internal Connections. Power strips are considered eligible only if they are a bundled component part of an eligible service or product.	Conditional	459 460
RAID	Short for Redundant Array of Independent Disks, RAID is a category of disk that employs two or more drives in combination for fault tolerance and performance. RAID disk drives are eligible only if used in an eligible component.	Conditional	459 460
Relay I/O Module	Uninterruptable Power Supply module that integrates full UPS control into dry contact environments such as PBX's.	Yes	459 460
Remote Access Router	A router on a LAN with a digital DSU/CSU built in for dial up or remote access of a network.	No	459 460
Remote Access Server	Multi Protocol remote access server for dial-in, dial-out and LAN to LAN connections over both analog and digital phone lines. This Server provides flexible TCP/IP address assignment schemes for dial-in users and does not limit its use to those meeting the definition of an eligible Internal Connection.	No	459 460
Routers	Routers are switching devices that can act as an interface between two networks and connect different segments such as departments, or floors in a building. Functionally, routers select the routing path for traffic, may provide network management capabilities, such as load balancing and provide trouble shooting diagnostic capabilities.	Yes	460

CC DOCKET NO. 96- 45¹

Satellite Dishes	Satellite Dishes are eligible only if provided as part of Telecommunications Services, or if leased as a component of a Wireless Wide Area Network used to access the Internet.	Conditional	437
SCSI	<p>SCSI or "Scuzzy Disk Drive" is a means, slightly more efficient and faster than a typical IDE hard drive, of getting information into and out of the Microprocessor. It allows devices such as magnetic hard disks, CD-ROM drives and tape drives to interface with the processor. SCSI disk drives usually come with a microprocessor and a termination card.</p> <p>The SCSI is eligible for discount as part of an eligible server. It is not eligible for discount if installed or used for a workstation.</p>	Conditional	459 460
Servers	<p>A computer or device on a network that manages network resources. For example, a file server is a computer and storage device dedicated to storing files. Any user on the network can store files on the server.</p> <p>CD Rom Server</p> <p>Domain Name Server</p> <p>"E" Mail Server</p> <p>File Server</p> <p>Communications Server</p> <p>Terminal Server</p> <p>Web Server</p>	<p>No</p> <p>Yes</p> <p>Yes</p> <p>Yes</p> <p>Yes</p> <p>Yes</p> <p>Yes</p>	<p>461</p> <p>460</p> <p>460</p> <p>460</p> <p>460</p> <p>460</p> <p>460</p> <p>459, 460</p>
SNMP System Management Module	Simple Network Management Protocol adapter that allows for SNMP to be introduced into the Ethernet network to manage devices and their interaction with TCP/IP.	Yes	459 460

Web Server	<p>A web server is a computer which is connected to the Internet or Intranet, stores documents, files and displays them to users when accessing the server via http or hypertext transfer protocol. Web server software loaded onto a file server provides the same function.</p> <p>Every Web server has an IP address and possibly a domain name. The server fetches the page named <i>index.html</i> and sends it to your browser. Any computer can be turned into a Web server by installing server software and connecting the machine to the Internet.</p>	Yes	459 460
Wire Manager	Wire Managers are wire restraints to house/arrange wiring and cabling. They can be aluminum or plastic and may be rack mountable.	Yes	459 460
Wireless PBX Adjunct	An adjunct that functions in conjunction with a Private Branch Exchange, to provide wireless capability to the station end.	Yes	458 460
Wiring, Internal	Including, but not limited to: cable (copper/fiber/coax), bays, jacks, blocks, panels, and terminals. Included in this category is all wiring and cable necessary to transport information all the way to individual classrooms. Wiring may also include Category 5 type of wiring.	Yes	458 459 460

CERTIFICATE OF SERVICE


I, Kerryln Rowe, a secretary at the law firm of Shook, Hardy & Bacon, LLP, do hereby certify that on this 25th day of August, 2000, I have caused to be mailed, copies of the foregoing **"Application For Review"** to the following:

Universal Service Administrative Company
100 South Jefferson Road
Whippany, NJ 07981

Ms. Kate L. Moore
President, Schools & Libraries Division
Universal Service Administrative Company
2021 L Street, N.W., Suite 600
Washington, DC 20037

D. Scott Barash, Esq.
Vice President & General Counsel
Universal Service Administrative Company
2021 L Street, N.W., Suite 600
Washington, DC 20037

Ms. Sharon L. Webber
Deputy Chief, Accounting Policy Division
Common Carrier Bureau
Room 5-B552
Federal Communications Commission
512 12th Street, S.W.
Washington, DC 20554


Kerryln Rowe